

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.,)	CASE NO. 1:08-CV-2755
)	
Plaintiff,)	JUDGE DONALD C. NUGENT
)	
v.)	MOTION TO QUASH THE SAP
)	DEFENDANTS' "NOTICE OF SUBPOENA
SAP AMERICA, INC., et al.)	TO TESTIFY AND PRODUCE
)	DOCUMENTS AT TRIAL UNDER
Defendants.)	FEDERAL RULE OF CIVIL PROCEDURE
)	30(b)(6)"

Plaintiff Hodell-Natco Industries, Inc. ("Hodell") submits the following Motion to Quash the SAP Defendants' "Notice of Subpoena to Testify and Produce Documents at Trial under Federal Rule of Civil Procedure 30(b)(6)." As discussed in the attached Memorandum in Support, the Court should quash SAP's subpoena because it is an impermissible attempt to make an end-run around the discovery deadline, the requested documents are not relevant, the subpoena imposes an undue burden on Hodell, and the subpoena is procedurally improper. Hodell also requests that the Court award Hodell its reasonable costs and attorneys' fees incurred in responding to SAP's baseless subpoena.

Dated: June 12, 2015

Respectfully submitted,

/s/ P. Wesley Lambert
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CERTIFICATE OF SERVICE

The undersigned certifies that on June 12, 2015, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access the document through the Court's electronic filing system.

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